UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604

DATE:

JUL 28 2011

SUBJECT: INSPECTION REPORT – Sun-Times Media Holdings, LLC – Ashland Newspaper

Printing Facility, Chicago, IL

FROM: Michelle Heger, Environmental Engineer

AECAS (IL/IN)

THRU: Brent Marable, Chief

AECAS (IL/IN)

TO: File

Date of Inspection: May 17, 2011

Attendees: Michelle Heger, Environmental Engineer, U.S. EPA

Shannon Downey, Environmental Engineer, U.S. EPA

Barbara Ercoli, Senior Human Resources Manager, Sun Times Media Anthony Triner, Sr., Vice President Production, Sun Times Media

Steve Frey, Senior Associate, Malcolm Pirnie Arcadis, Inc.

Purpose of Inspection:

The purpose of conducting an inspection of the Sun Times Ashland Distribution Publishing and Printing facility was to assess compliance with air pollution control regulations under the Clean Air Act, with federally approved portions of the Illinois State Implementation Plan, and with their Lifetime Operating Permit.

Company Description and Background:

Location: 777 West Chicago Avenue, Chicago, Illinois 60610

Primary Contact: Barbara Ercoli, Senior Human Resources Manager, Sun Times Media

Anthony Triner, Sr., Vice President Production, Sun Times Media

The Chicago Sun Times (Sun Times) facility operates a lithographic printing process utilizing eight non-heatset web offset lithographic printing presses. The facility does not have air pollution control equipment, but has usage limits for VOM containing materials used in the process (ink, blanket wash, and fountain solution). Standard operating time is 24 hours a day, 7 days a week.

The Sun Times employs approximately 439 employees with about 125-140 employees per shift.

Inspection

Opening Meeting and Discussion

U.S. EPA representatives (we) arrived at Sun Times at approximately 9:15 am CST on May 17th. We were directed to a conference room where we were joined by Barbara Ercoli (Sun Times), Steve Frey (Malcolm Pirnie), and Anthony Triner (Sun Times) at 10:45 am for a process discussion. Mr. Steve Frey is contracted by the Sun Times for air permitting and compliance. Mr. Triner gave a process overview as follows:

Process Description

First, the paper's electronic files are sent from the Sun Times' downtown editorial location to the Plating Room at this facility where they are electronically etched onto metal plates. Each plate is fed onto a machine which bends and cuts the plate to the correct size to fit the appropriate press. In the plating room, the plates are cleaned with various liquid solutions. Any extra solution is caught in a tray system and collected periodically by the company Safety-Kleen for recycling. From the plating room, the plates are manually loaded onto rollers and fed to the presses. The Sun Times operates eight presses; six presses are global newsliners (double wide with four forms across) and two presses are universal presses (single wide with two images across). Each lithographic press prints a full paper.

Ink is pumped to the press inkers via an enclosed system. A press solution mixture of 1.75 oz solution to 1 gallon water is also pumped from a 250 gallon tank up to the spraybar in the printing unit. The press solution is sprayed into the water roller inside the unit and transferred by rubber roller to the metal plates. The purpose of the press solution is to prevent ink from being transferred outside of the desired print type (fills the negative space). The ink is pumped through the spraybar inker into the rubber roller system. It is transferred to a plate and rolled onto the paper.

Each paper is folded and cut in the Folder Area. Finally, finished papers are sent to the Mailroom via conveyors for tying and distribution to trucks. Approximately 470,000 papers are produced at night. The amount of papers printed during the day varies by the number of required "preprints."

The Sun Times does not have any air pollution control equipment. VOM emissions are calculated based on monthly usage of ink, blanket wash, and fountain solution. The Sun Times uses the calculated emission values to demonstrate compliance with the monthly usage requirements and VOM emission limits in their Lifetime Operating Permit (I.D. No. 031600GDF, Application No. 97120098).

Tour

Ms. Ercoli, Mr. Frey, and Mr. Triner led us to the Plating Room to begin the tour. In the Plating Room, we observed about 30 containers at 6.3 gallons each of "metafix chemicals." Mr. Triner mentioned that these chemicals are used to clean the plates and mix with water down the drain. EPA requested the MSDS of these cleaning solutions. The plating system is cleaned out approximately once a week, or every 15,000 plates, and is kept at ambient temperature. During peak printing periods, all four plating lines run simultaneously. Mr. Triner ran a metal plate through the system for us to view the plating process in operation.

Next, we moved to the printing press area. A full paper roll has a 50" diameter, is 50" across, and weighs about 2000 lb, so paper rolls are loaded mechanically by automated guided vehicles from the reel room downstairs. We viewed the spraybar, rubber roller, and a plate fed through the press system. Next, the paper moved up a conveyor to the Mailroom. Mr. Trier explained that ink flow to the presses is constantly automatically adjusted. Each dot of ink is only about one ten-thousandth of an inch.

Next, we went to the Mailroom downstairs. Each press has two stacker lines; one stacker is used as a back-up so there is no break in the flow of paper stacking. Ninety-five percent of the paper arrives via rail and is kept in the Paper Warehouse. The Sun Times keeps approximately 10-12 days worth of paper onsite (1800-2000 tons) at any given time.

In the ink storage area, we observed the ink tanks. The ink is delivered via tanker lines located outside the main building. The facility has two black ink 44,000 lb storage tanks and receives a shipment of black ink approximately every 10 days. They also have two-11,000 lb tanks each for cyan, magenta, and blue inks, delivered once every 2-3 weeks. Ink for the universal presses is delivered as needed and maintained in a 990 gallon tank. All inks are water based and do not contain lead. The Sun Times currently obtains ink from a local West Chicago company called Central Ink Company.

In the mixing area, city water is fed directly into refrigerated cabinets where four acid solution tanks at 330 gallons each are kept. EPA requested that information be provided regarding the compressors used in this area including refrigerant type and usage information.

Mr. Frey indicated that the particulate matter (PM) emission limit in the permit may refer to the cutting operations. Compliance with the limit is determined by system throughput; the Sun Times does not have PM emission controls and have never conducted a stack test for PM.

Closing meeting

In the closing meeting, EPA requested the following information be sent within a week via email:

- 1. Process flow diagram
- 2. Site layout drawing
- 3. Identification of fountain solution, MSDS

- 4. MSDS for inks, fountain solutions, and blanket wash
- 5. 2008, 2009, 2010 Annual Air Emissions reports
- 6. 2008, 2009, 2010 material usage information in spreadsheet format
- 7. Compressors refrigerant type and usage information

Sun Times declined to claim any information taken by EPA as Confidential Business Information. EPA representatives left at approximately 12 pm.

standard bccs: originator receives original report originating reading file w/o attachments

other bccs: